

REMARKS

Applicants request favorable reconsideration and withdrawal of the rejection set forth in the above-mentioned Office Action in view of the foregoing amendments and the following remarks.

Claims 1, 3-10, 13, and 15-19 are now pending, with claims 1, 7, and 8 being independent claims. Claims 1, 7, and 8 have been amended herein. Claims 17-19 have been newly added and Claim 14 has been cancelled without prejudice or disclaimer. Support for the amendments and newly added claims can be found throughout the originally-filed disclosure, including, for example, in Figure 3 and at paragraphs [0030] and [0031] of the specification. Thus, Applicants submit the amendments include no new matter.

Claims 1, 3-10 and 13-16 are again rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over Lai et al. (U.S. Patent No. 5,706,429) in view of Helland et al. (U.S. Patent No. 5,890,161), Suorsa (U.S. Patent No. 7,124,289), Yu (U.S. Patent No. 5,433,483), Roche (U.S. Patent No. 4,879,557), Vaghi (U.S. Patent No. 6,047,273), and Taylor et al. (U.S. Patent No. 6,256,676).

Applicants respectfully traverse the rejections. Nevertheless, without conceding the propriety of the rejections and solely to expedite prosecution, independent claims 1, 7, and 8 have been amended to clarify the distinctions between the cited references and the claims. Accordingly, Applicants submit that the invention recited in the independent claims is patentably defined over the cited references for at least the following reasons.

Amended independent claim 1 recites a vertically integrated method for facilitating the processing of transactions comprising, *inter alia*, receiving a request at a host system from an entity for a transaction, and determining, at the host system, software programs for processing the

transaction, with the software programs being selected from a plurality of software programs located on a software solution system configured as a different system from the host system and the entity, the software programs providing processing for different services. Independent claim 1 also recites accessing the software programs via a network to process the transaction. At least one of the software programs accesses at least one other of the software programs. Independent claim 7 recites an apparatus that comprises modules that include features similar to the features recited in independent claim 1. Independent claim 8 recites a method for providing a single source for facilitating the processing of transactions comprising, inter alia, calling, via a network, a plurality of software programs in a solution stack located on a software solution system configured as a different system from the host system and the entity, to process the transactions received from entities.

The Office Action cites Lai et al. as disclosing all the features of the claimed invention except for specifying a remote processing and particular software services. The Office Action attempts to cure this deficiency by citing Helland et al. Applicants maintain that any combination of citations does not disclose or suggest programs located on a software solution system configured as a different system from the host system and the entity as recited in amended claims 1, 7 and 8. Nevertheless, in order to expedite allowance, Applicants have amended the independent claims to further recite that at least one of the software programs accesses at least one other of the software programs. Such a feature is also not believed to be disclosed or suggested by the applied art.

Lai et al. describes a transaction processing system that includes a host computer 12 including an information management system 20 that enables communication between connection

processor 18 and applications 16. However, Lai et al. is not believed to disclose or suggest that one of applications 16 accesses another of the applications 16.

Thus, Lai et al. fails to disclose or suggest important features of the present invention recited in the independent claims.

Helland et al. fails to remedy the deficiencies of Lai et al. noted above with respect to amended claims 1, 7, and 8. In Helland et al., a single server computer 20 (84 in Fig. 2) and remote client computers 49 (92 in Fig. 2) are connected. An operating system 35 and one or more application programs 36 can be stored in the server computer. However, none of the software programs on the server computer or on the client computer can be construed as programs located on a different system, with one of those applications accessing another of those applications.

Accordingly, Applicants submit that Lai et al. and Helland et al. fail to disclose or suggest a plurality of software programs located on a software solution system configured as a different system from the host system and the entity, the software programs providing processing for different services, and at least one of the software programs accessing at least one other of the software programs, as recited in amended claims 1, 7, and 8.

Applicants further submit the secondary citations to Suorsa, Yu, Roche, Vaghi, and Taylor et al., fail to cure the deficiencies of Lai et al. and Helland et al. with respect to the independent claims of the present application. The Office Action cites Suorsa, Yu, Roche, Vaghi, and Taylor et al. as suggesting specific types of software, as are recited in the dependent claims of the present application. Applicants submit, however, that these references, whether taken individually or collectively, fail to disclose or suggest the recited features in the independent claims of the present application.

For at least the foregoing reasons, Applicants submit the invention recited in independent claims 1, 7, and 8 is patentably defined over the cited references.

The other claims are allowable by virtue of their dependency and in their own right further defining the invention. Individual consideration of the dependent claims is respectfully requested.

Applicants submit that all of the pending claims are allowable over the references of record, and that the application is in condition for allowance. Favorable reconsideration, withdrawal of the rejection, and passage to issue of the present application are earnestly solicited.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our New York office at the address shown below.

Respectfully submitted,

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